



BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
Chairman

JIM IRVIN
Commissioner

Arizona Corporation Commission

DOCKETED

WILLIAM A. MUNDELL
Commissioner

MAR 28 2003

MIKE GLEASON
Commissioner

DOCKETED BY	<i>mae</i>
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JEFF HATCH-MILLER
Commissioner

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ARIZONA CORPORATION COMMISSION
CONTROL

IN THE MATTER OF THE APPLICATION)
OF THE ARIZONA ELECTRIC DIVISION)
OF CITIZENS COMMUNICATIONS)
COMPANY TO CHANGE THE CURRENT)
PURCHASED POWER AND FUEL)
ADJUSTMENT CLAUSE RATE, TO)
ESTABLISH A NEW PURCHASED)
POWER AND FUEL ADJUSTMENT)
CLAUSE BANK, AND TO REQUEST)
APPROVED GUIDELINES FOR THE)
RECOVERY OF COSTS INCURRED IN)
CONNECTION WITH THE ENERGY)
RISK MANAGEMENT INITIATIVES.)

DOCKET NO. E-01032C-00-0751

IN THE MATTER OF THE APPLICATION)
OF CITIZENS COMMUNICATIONS)
COMPANY, ARIZONA GAS DIVISION,)
FOR A HEARING TO DETERMINE THE)
FAIR VALUE OF ITS PROPERTIES FOR)
RATEMAKING PURPOSES, TO FIX A)
JUST AND REASONABLE RATE OF)
RETURN THEREON, AND TO APPROVE)
RATE SCHEDULES DESIGNED TO)
PROVED SUCH RATE OF RETURN.)

DOCKET NO. G-01032A-02-0598

1 IN THE MATTER OF THE JOINT)
2 APPLICATION OF CITIZENS)
3 COMMUNICATIONS COMPANY AND)
4 UNISOURCE ENERGY CORPORATION)
5 FOR THE APPROVAL OF THE SALE OF)
6 CERTAIN ELECTRIC UTILITY AND)
7 GAS UTILITY ASSETS IN ARIZONA,)
8 THE TRANSFER OF CERTAIN)
9 CERTIFICATES OF CONVENIENCE)
10 AND NECESSITY FROM CITIZENS)
11 COMMUNICATIONS COMPANY TO)
12 UNISOURCE ENERGY CORPORATION,)
13 THE APPROVAL OF THE FINANCING)
14 FOR THE TRANSACTIONS AND OTHER)
15 RELATED MATTERS.)

DOCKET NO. E-01933A-02-0914
DOCKET NO. E-01032C-02-0914
DOCKET NO. G-01032A-02-0914

10 **JOINT APPLICANTS' RESPONSE TO**
11 **SOUTHWEST GAS CORPORATION'S SUPPLEMENTAL**
12 **APPLICATION FOR LEAVE TO INTERVENE**

13 In its original Application for Intervention, Southwest Gas Corporation
14 ("Southwest") candidly admitted that its real interest in this proceeding concerns the
15 policies or precedents that might be set that could have an impact on future proceedings.
16 Having been denied intervention on those grounds, Southwest now files a Supplemental
17 Application seeking to pursue its interest in this proceeding by using the "hook" that it is a
18 vendor/supplier for Tucson Electric Power ("TEP").¹ In other words, Southwest seeks
19 intervention in this case because it sells natural gas to TEP under a Commission approved
20 special retail contract. Southwest Gas implies, without any support, that it is concerned
21 about TEP's ability to perform that special retail contract with TEP. This case is not the
22 proper forum for addressing Southwest Gas' concerns about its special retail contract with
23
24

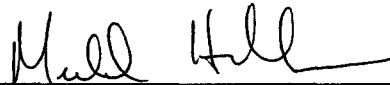
25 _____
26 ¹ Southwest also alleges that it is a customer of both TEP and Citizens, but it is clearly basing its intervention request on its role as a creditor/vendor of TEP.

1 TEP. Indeed, any such concerns are addressed by the terms of the special retail contract
2 and applicable tariff provisions. Southwest's Supplemental Intervention Application
3 should be denied.
4

5 If the Commission is inclined to grant this Supplemental Intervention, Southwest's
6 intervention should be limited to the TEP loan to UniSource.

7 RESPECTFULLY SUBMITTED this 28th day of March, 2003.

8
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16 ORIGINAL AND seventeen (17) copies
17 of the foregoing hand-delivered
18 this 28th day of March, 2003, to:

19 Arizona Corporation Commission
20 Utilities Division – Docket Control
21 1200 W. Washington Street
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23 COPY of the foregoing hand-delivered
24 this 28th day of March, 2003, to:

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11 COPY of the foregoing sent by mail
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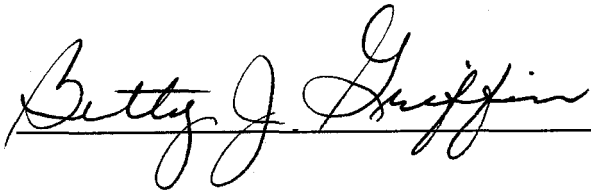
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